

### **REMARKS**

The office action of October 10, 2007, has been reviewed and these remarks are responsive thereto. Claims 10-17 have been added. No new matter has been added. Claims 2 and 3 have been cancelled without prejudice or disclaimer. Claims 1 and 4-17 are pending upon entry of the present amendment. Reconsideration and allowance of the instant application are respectfully requested.

#### **Claim Rejections**

Claims 1 and 4-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over King *et al.* (U.S. Patent No. 5,953,541, “King”) in view of Walker (U.S. Patent No. 6,528,741 B2, “Walker”) and in further view of Tsuji *et al.* (U.S. Patent No. 5,581,599, “Tsuji”). Applicants respectfully traverse.

Amended independent claims 1 and 7 generally relate to, *inter alia*, scrolling through a plurality of different characters in response to user input corresponding to a pressing of another key on the keypad, wherein the another key becomes a dedicated scroll key when in an editor mode. The Office Action concedes that the combination of Walker and King fails to clearly state that the dedicated key is a scrolling key but that Tsuji discloses this feature at col. 10 lines 33-45. Even assuming, without conceding, that Tsuji describes a dedicated scrolling key, none of the cited references still fail to teach or suggest that a key *becomes* a dedicated scroll key *when in an editor mode*. Indeed, the dedicated scrolling keys of Tsuji are dedicated to scrolling during modes other than editor mode (for example, used in scrolling through stored names). See col. 10, lines 9-13. As such, Tsuji’s scroll key does not *become dedicated* in an editor mode since it was already a dedicated scroll key prior to entering the editor mode. Notably, Figure 1 depicts the scroll keys as permanent “dedicated” keys. Additionally, the Office Action fails to specifically point out where Tsuji teaches or suggest wherein one of the keys *becomes* dedicated for scrolling. Neither of the other cited references cures these deficiencies of Tsuji. Accordingly, such a combination, even if proper, does not teach or suggest each and every feature of claims 1 and 7. Claims 1 and 7 are thus allowable for at least these reasons.

Furthermore, there is no motivation or suggestion to combine Tsuji with King and Walker. The Office Action alleges that it would have been obvious to combine the references to “allow a user to selectively input characters for a desired text string in a mobile phone.”

However, Walker teaches away from including a dedicated scroll key as Walker attempts to improve on “repeated presses of a key” (see Walker at col. 1, lines 20-25) that may be “slow and prone to error.” See Walker at col. 1, lines 20-29. Walker describes a multi-way shift key which corresponds to character labels as an alternative. Further, the Action’s asserted manner does not explain why one of ordinary skill in the art would have included a key that *becomes* dedicated for scrolling *in an editor mode*. Thus, Applicants respectfully submit that the Action has not provided any motivation for making the asserted combination. Further, the asserted motivation is not a motivation to combine references, but rather is the conclusion the examiner has apparently reached after having benefited from reading Applicant’s own disclosure, and is thus impermissible hindsight.

Amended independent claim 5 recites, *inter alia*, a scroll key being one of the alphanumeric keys that becomes dedicated for scrolling when said terminal is in an editor mode. As discussed, none of the cited references teaches or suggests such features. Accordingly, claim 5 is allowable for at least this reason.

Claims 4, 6, 8 and 9 depend from claims 1 and 7, respectively, and are thus allowable for at least the same reasons as their respective base claim and in further view of the advantageous features recited therein.

### ***New Claims***

New claims 10-17 have been added. While Applicants note that these claims have not been rejected, Applicants submit the following remarks in the interest of expediting prosecution.

Claim 14 recites features similar to those discussed above with respect to claim 1 and 7 and is thus allowable for at least the same reasons as claims 1 and 7.

Claims 10-13 and 15-17 are dependent on claims 1, 7 and 14, respectively, and are thus allowable for at least the same reasons as their base independent claim and further in view of the novel and non-obvious features recited therein. For example, claim 17 recites, *inter alia*, “wherein the another key corresponds to a non-scrolling function when not in the editor mode.” Nowhere does any of the cited references, either separately or in combination, teach or suggest such features. Accordingly, claim 17 is allowable for this additional reason.

**CONCLUSION**

Based on the foregoing, Applicant respectfully submits that the application is in condition for allowance and a Notice to that effect is earnestly solicited. Should the Examiner believe that anything further is desirable in order to place the application in even better form for allowance, the Examiner is respectfully urged to contact Applicant's undersigned representative at the below-listed number.

Respectfully submitted,

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